

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ARGOS USA LLC,

Plaintiff,

v.

CHRISTOPHER YOUNG,

Defendant.

Case No. 1:18-cv-02797-ELR

**DECLARATION OF LUKE HASSKAMP IN SUPPORT OF MOTION
FOR ORDER REQUIRING PRE-DISCOVERY IDENTIFICATION OF
TRADE SECRETS**

I, Luke Hasskamp, in support of Motion for Order Requiring Pre-Discovery Identification of Trade Secrets, state as follows:

1. I am a partner at Bona Law PC, attorneys for defendant in the above-captioned matter; and have personal first-hand knowledge of the facts stated herein.

2. On May 19, 2020, Argos served its first sets of requests for production and interrogatories on Young.

3. The discovery requests are tremendously broad and seek a wide range of documents and information. Specifically, Argos served 43 requests for production and 18 interrogatories.

4. On May 22, 2020, I responded to Argos' counsel confirming receipt of the discovery requests.

5. Further, because of the broad nature of the discovery requests and the general allegations in Argos' complaint, I requested that Argos "describe with particularity the trade secrets at issue" so that Young could understand the contours of the case against him.

6. Between May 22, 2020, and June 16, 2020, counsel for Argos and myself engaged in several rounds of correspondence relating to Young's request. A true and correct copy of those email messages is attached as Exhibit A.

7. On May 28, 2020, Argos provided a "Preliminary Statement" purporting to provide a "preliminary description of the trade secrets at issue in this case." A true and correct copy of that "Preliminary Statement" is attached as Exhibit B.

8. The Preliminary Statement identified eight broad categories of purported trade secrets, although it did not describe any purported trade secret with specificity.

9. The eight broad categories also included purported trade secrets that appeared to have no connection to the complaint's allegations.

10. Further, Argos' purported to identify categories that could not possibly constitute its own trade secrets, such as photographs taken by Young.

11. I continued to request greater specificity from Argos, noting my concern that Young could not meaningfully respond to the substance of Argos' discovery requests until Argos specifically identified and described its purported trade secrets with specificity. Argos refused to do so.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 17th day of June 2020 at Long Beach, California.

/s/ Luke Hasskamp
Luke Hasskamp

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of June 2020, the foregoing Declaration of Luke Hasskamp in Support of Motion for Order Requiring Pre-Discovery Identification of Trade Secrets was filed electronically with the Clerk of the Court using the CM/ECF system which will send a notification of such filing to all counsel of record in this matter.

/s/ Aaron Gott

AARON GOTT

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